

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

-v.-

JEVAUN CHARLES,  
a/k/a "Bobby,"  
a/k/a "O'Melly,"  
ALYSHA BELTRE,  
a/k/a "Ally Racks,"  
DEURI CARAMBOT,  
a/k/a "Kenny,"  
a/k/a "Ralphie,"  
SHAKUR CULBERT,  
a/k/a "Chase,"  
ALVIN FERNANDEZ,  
a/k/a "Al.P.,"  
JASON GONZALEZ,  
a/k/a "Why,"  
MALCOLM RIVERA,  
a/k/a "Boyy,"  
MIKE SILVA,  
a/k/a "Cuba,"  
DANIEL SILVA,  
MAXWELL SMITH,  
a/k/a "Max,"  
a/k/a "Max Payne,"  
MARLON WATSON,  
a/k/a "Menace,"  
a/k/a "Tega,"  
a/k/a "Black,"  
a/k/a "King," and  
KEWAANNEE WILLIAMS,  
a/k/a "Kay,"  
a/k/a "Keys,"

Defendants.  
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:  
: **SEALED**  
: **INDICTMENT**  
:

: 21 Cr.

: **21 CRIM 412**

**COUNT ONE**  
**(Narcotics Conspiracy)**

The Grand Jury charges:

1. From at least in or about 2010, up to and including June 2021, in the Southern District of New York and elsewhere, JEVAUN CHARLES, a/k/a "Bobby," a/k/a "O'Melly," ALYSHA BELTRE, a/k/a "Ally Racks," DEURI CARAMBOT, a/k/a "Kenny," a/k/a "Ralphy," SHAKUR CULBERT, a/k/a "Chase," ALVIN FERNANDEZ, a/k/a "Al.P," JASON GONZALEZ, a/k/a "Why," MALCOLM RIVERA, a/k/a "Boyy," MIKE SILVA, a/k/a "Cuba," DANIEL SILVA, MAXWELL SMITH, a/k/a "Max," a/k/a "Max Payne," MARLON WATSON, a/k/a "Menace," a/k/a "Tega," a/k/a "Black," a/k/a "King," and KEWAANNEE WILLIAMS, a/k/a "Kay," a/k/a "Keys," the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JEVAUN CHARLES, a/k/a "Bobby," a/k/a "O'Melly," ALYSHA BELTRE, a/k/a "Ally Racks," DEURI CARAMBOT, a/k/a "Kenny," a/k/a "Ralphy," SHAKUR CULBERT, a/k/a "Chase," ALVIN FERNANDEZ, a/k/a "Al.P," JASON GONZALEZ, a/k/a "Why," MALCOLM RIVERA, a/k/a "Boyy," MIKE SILVA, a/k/a "Cuba," DANIEL SILVA, MAXWELL SMITH, a/k/a "Max," a/k/a "Max Payne," MARLON WATSON, a/k/a "Menace," a/k/a "Tega," a/k/a "Black," a/k/a "King," and KEWAANNEE

WILLIAMS, a/k/a "Kay," a/k/a "Keys," the defendants, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that JEVAUN CHARLES, a/k/a "Bobby," a/k/a "O'Melly," ALYSHA BELTRE, a/k/a "Ally Racks," DEURI CARAMBOT, a/k/a "Kenny," a/k/a "Ralphy," SHAKUR CULBERT, a/k/a "Chase," ALVIN FERNANDEZ, a/k/a "Al.P," JASON GONZALEZ, a/k/a "Why," MALCOLM RIVERA, a/k/a "Boyy," MIKE SILVA, a/k/a "Cuba," DANIEL SILVA, MAXWELL SMITH, a/k/a "Max," a/k/a "Max Payne," MARLON WATSON, a/k/a "Menace," a/k/a "Tega," a/k/a "Black," a/k/a "King," and KEWAANNEE WILLIAMS, a/k/a "Kay," a/k/a "Keys," the defendants, conspired to distribute and possess with intent to distribute were: (i) 280 grams and more of mixtures and substances containing a detectable amount of cocaine base in a form commonly known as "crack cocaine," in violation of Title 21, United States Code, Section 841(b)(1)(A); (ii) mixtures and substances containing a detectable amount of heroin, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (iii) mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

**COUNT TWO**

**(Possession of a Firearm During a Drug Trafficking Crime)**

The Grand Jury further charges:

4. Between in or about 2010 and June 2021, in the Southern District of New York and elsewhere, JEVAUN CHARLES, a/k/a "Bobby," a/k/a "O'Melly," ALYSHA BELTRE, a/k/a "Ally Racks," DEURI CARAMBOT, a/k/a "Kenny," a/k/a "Ralphy," SHAKUR CULBERT, a/k/a "Chase," ALVIN FERNANDEZ, a/k/a "Al.P," JASON GONZALEZ, a/k/a "Why," MALCOLM RIVERA, a/k/a "Boyy," MIKE SILVA, a/k/a "Cuba," DANIEL SILVA, MAXWELL SMITH, a/k/a "Max," a/k/a "Max Payne," MARLON WATSON, a/k/a "Menace," a/k/a "Tega," a/k/a "Black," a/k/a "King," and KEWAANNEE WILLIAMS, a/k/a "Kay," a/k/a "Keys," the defendants, during and in relation to a drug trafficking offense for which they may be prosecuted in a court of the United States, namely, the conspiracy to distribute and possess with intent to distribute controlled substances as charged in Count One of this Indictment, knowingly did use and carry a firearm, and in furtherance of such drug trafficking offense, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

**FORFEITURE ALLEGATIONS**

5. As a result of committing the offense charged in Count One of this Indictment, JEVAUN CHARLES, a/k/a "Bobby," a/k/a

"O'Melly," ALYSHA BELTRE, a/k/a "Ally Racks," DEURI CARAMBOT, a/k/a "Kenny," a/k/a "Ralphy," SHAKUR CULBERT, a/k/a "Chase," ALVIN FERNANDEZ, a/k/a "Al.P," JASON GONZALEZ, a/k/a "Why," MALCOLM RIVERA, a/k/a "Boyy," MIKE SILVA, a/k/a "Cuba," DANIEL SILVA, MAXWELL SMITH, a/k/a "Max," a/k/a "Max Payne," MARLON WATSON, a/k/a "Menace," a/k/a "Tega," a/k/a "Black," a/k/a "King," and KEWAANNEE WILLIAMS, a/k/a "Kay," a/k/a "Keys," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense that the defendants personally obtained.

**Substitute Assets Provision**

6. If any of the property described above as subject to forfeiture, as a result of any act or omission of the above-named defendants:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;

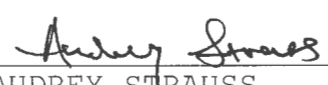
d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21 United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

  
FOREPERSON

  
AUDREY STRAUSS  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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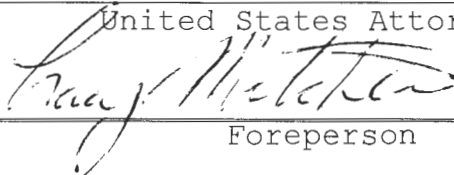
**SEALED**  
**INDICTMENT**

21 Cr.

(18 U.S.C. §§ 924(c) and 2; 21 U.S.C. §  
846.)

AUDREY STRAUSS

United States Attorney.



Foreperson

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